

Message

From: Sanchez, Brian [sanchez.brian@epa.gov]
Sent: 6/21/2018 4:51:36 PM
To: Erin Formanek [Formanekek@cdmsmith.com]
CC: Cirian, Mike [Cirian.Mike@epa.gov]; Berry, David [Berry.David@epa.gov]; Gunnar Emilsson [EmilssonGR@cdmsmith.com]
Subject: RE: CFAC Phase 2 SAP Modifications comments

Sounds good.

Thanks, Erin.

Brian

From: Formanek, Erin [mailto:formanekek@cdmsmith.com]
Sent: Thursday, June 21, 2018 10:37 AM
To: Sanchez, Brian <sanchez.brian@epa.gov>
Cc: Cirian, Mike <Cirian.Mike@epa.gov>; Berry, David <Berry.David@epa.gov>; Gunnar Emilsson <EmilssonGR@cdmsmith.com>
Subject: RE: CFAC Phase 2 SAP Modifications comments

Brian,

Thank you for the additional comments. In regard to #2, I checked what I think is the source of the TEQ screening values (Efroymson et al., 1997) and agree the units are incorrect. They should be pg/g. Because of this, I think they also need to consider LANL (EcoRisk, Release 4.1) as a source for a mammal TEQ screening value (0.29 pg/g). This value is lower than the value they are using (albeit close), and the Efroymson et al. study being used is an injection study which may not be optimal to use. I will add mention of this in the comments as well if you agree.

Thank you,
Erin

From: Sanchez, Brian <sanchez.brian@epa.gov>
Sent: Thursday, June 21, 2018 10:03 AM
To: Formanek, Erin <formanekek@cdmsmith.com>
Cc: Cirian, Mike <Cirian.Mike@epa.gov>; Berry, David <Berry.David@epa.gov>; Emilsson, Gunnar <EmilssonGR@cdmsmith.com>
Subject: FW: CFAC Phase 2 SAP Modifications comments

Hi Erin,

I am in agreement with the comments.

A couple of minor additions to suggest:

1. Mod#2 Rationale for Modifications/Potential Implications of Modifications section
 - a. Fifth line down in second paragraph refers to "a total of 12 samples distributed across Montana". This makes it sound like the MDEQ dioxin background study consisted of only 12 samples and that dioxins were detected in each of the 12 samples. The MDEQ study considered 223 surface soil samples. If Roux is referring to a subset of those samples, that subset should be defined.
2. Field Mod #2 Figures and Plates

- a. I think that the units for TEQ stated in the figures and plates are wrong. It is stated that "All samples are in picograms per kilograms". I believe that it should be pg/g or ng/kg.

From: Emilsson, Gunnar [<mailto:EmilssonGR@cdmsmith.com>]

Sent: Thursday, June 21, 2018 8:46 AM

To: Cirian, Mike <Cirian.Mike@epa.gov>

Cc: Sanchez, Brian <sanchez.brian@epa.gov>; Berry, David <Berry.David@epa.gov>; Erin Formanek <Formanekek@cdmsmith.com>

Subject: RE: CFAC Phase 2 SAP Modifications comments

Hi Mike:

No, these are just CDM Smith's draft comments. I copied Brian and David when I sent them to you yesterday (copying them again), so they would have a chance to add to them if they had anything else.

Brian and David:

Hopefully you will have time to review the proposed mods that we got on Monday and our comments that I sent out yesterday afternoon. Does end of today work for both of you? An email to Mike indicating concurrence would be appreciated. If you have edits, additions, or questions, please contact Erin Formanek and she can make any adjustments to finalize the comments.

Thanks,

Gunnar Emilsson, P.G., P.E., BCEE

Project Manager

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From: Cirian, Mike <Cirian.Mike@epa.gov>

Sent: Thursday, June 21, 2018 7:49 AM

To: Emilsson, Gunnar <EmilssonGR@cdmsmith.com>

Subject: RE: CFAC Phase 2 SAP Modifications comments

Hi Gunnar,

Do these include coordinated comments from David and Brian? Are they ready to be sent to Roux?

Thanks

Mike Cirian, PE

Libby On-site Project Manager

US EPA

108 East 9th Street

Libby, MT 59923

(406) 293-6194 Office

From: Emilsson, Gunnar [<mailto:EmilssonGR@cdmsmith.com>]
Sent: Wednesday, June 20, 2018 2:32 PM
To: Cirian, Mike <Cirian.Mike@epa.gov>
Cc: Sanchez, Brian <sanchez.brian@epa.gov>; Berry, David <Berry.David@epa.gov>; Skipper, Sherry <Skipper.Sherry@epa.gov>; Dick Sloan <rsloan@mt.gov>; Erin Formanek <Formanek@cdmsmith.com>; Coan, Sean <CoanSM@cdmsmith.com>
Subject: CFAC Phase 2 SAP Modifications comments

Mike:

Attached please find CDM Smith's comments to the proposed Modification 2 and 3 to the CFAC RI/FS Phase 2 Sampling and Analysis Plan.

Please let us know if you have any questions.

Cc: Agency review team

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